



# American Rental Association

1900 – 19<sup>th</sup> Street Moline, Illinois 61265

(309) 764-2475

(800) 334-2177

Fax (309) 764-1533

<http://www.ararental.org>

November 15, 2005

Ms. Kitty Martin  
Manger, In Use Control  
Air Resources Board  
Mobile Source Division  
P.O. Box 2815  
Sacramento, CA 95812

**Regarding: ARA Proposed Regulatory Concepts for the ARB Off-Road Rule**

Dear Ms. Martin:

In accordance with your request, the American Rental Association (ARA) and our affiliate the American Rental Association of California are submitting a set of regulatory concepts and proposals for your review. During the months since the Air Resources Board (ARB) announced their plans for regulating diesel-powered mobile off-road engines greater than 25 horsepower, ARA and ARA of California have been working to ensure that we provide ARB with complete and accurate information about our industry and its operations in California. This submission is aimed at providing ARB with a set of regulatory concepts that outlines a path toward a regulation that will provide real reductions in particulate matter emissions from the regulated class of engines. We believe a regulation based on these concepts will be cost effective and will provide flexibility to the regulated parties.

ARA continues to seek further information from our members concerning the makeup of the rental equipment fleet in California. We are still receiving information from our members and we will submit additional information of the results of our analysis when they become available. We have also prepared economic analyses related to the behavior of rental firms when they make decisions about replacing equipment in their fleets which we will also submit when it is finalized.

We appreciate the opportunity to participate in this rulemaking process and look forward to working with you in the future.

Sincerely,

John W. McClelland Ph.D.  
Vice President, Government Affairs